UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN **SOUTHERN DIVISION**

IN RE AUTOMOTIVE PARTS 2:12-md-02311

ANTITRUST LITIGATION Honorable Marianne O. Battani

ALL CASES

THIS DOCUMENT RELATES TO:

ALL ACTIONS

END-PAYOR PLAINTIFFS' UNOPPOSED MOTION FOR ENTRY OF [PROPOSED] ORDER MODIFYING DISCOVERY STAY

End-Payor Plaintiffs respectfully request that the Court enter the [Proposed] Order Modifying Discovery Stay, which further modifies the stay of discovery in *In re Automotive* Parts Antitrust Litigation ("Auto Parts"). All parties and the U.S. Department of Justice have agreed on the language set forth in the [Proposed] Order Modifying Discovery Stay. Pursuant to Local Rule 7.1(a), before filing this motion, End-Payor Plaintiffs ascertained that no party opposed this motion and obtained concurrence for the relief sought.

Date: October 19, 2017 Respectfully submitted,

> /s/ Steven N. Williams Steven N. Williams Elizabeth Tran

COTCHETT, PITRE & McCARTHY, LLP

San Francisco Airport Office Center 840 Malcolm Road, Suite 200 Burlingame, CA 94010

Telephone: (650) 697-6000 Facsimile: (650) 697-0577

swilliams@cpmlegal.com etran@cpmlegal.com

Hollis Salzman Bernard Persky William V. Reiss

ROBINS KAPLAN LLP

399 Park Avenue, Suite 3600 New York, NY 10022 Telephone: (212) 980-7400 Facsimile: (212) 980-7499 HSalzman@RobinsKaplan.com BPersky@RobinsKaplan.com WReiss@RobinsKaplan.com

Marc M. Seltzer Steven G. Sklaver SUSMAN GODFREY L.L.P. 1901 Avenue of the Stars, Suite 950 Los Angeles, CA 90067-6029 Telephone: (310) 789-3100 Facsimile: (310) 789-3150 mseltzer@susmangodfrey.com

Terrell W. Oxford Chanler Langham Omar Ochoa

SUSMAN GODFREY L.L.P.

1000 Louisiana Street, Suite 5100

ssklaver@susmangodfrey.com

Houston, TX 77002 Telephone: (713) 651-9366 Facsimile: (713) 654-6666 toxford@susmangodfrey.com clangham@susmangodfrey.com oochoa@susmangodfrey.com

Interim Co-Lead Class Counsel for the Proposed End-Payor Plaintiff Class

E. Powell Miller
Devon P. Allard **THE MILLER LAW FIRM, P.C.**The Miller Law Firm, P.C.

950 W. University Dr., Ste. 300

Rochester, Michigan 48307

epm@millerlawpc.com dpa@millerlawpc.com

Interim Liaison Counsel for the Proposed End-Payor Plaintiff Class

CERTIFICATE OF SERVICE

I hereby certify that on October 19, 2017 I caused the foregoing END-PAYOR PLAINTIFFS' UNOPPOSED MOTION FOR ENTRY OF [PROPOSED] ORDER MODIFYING DISCOVERY STAY to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Steven N. Williams
Steven N. Williams